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Attorneys for Plaintiff The Procter & Gamble Company.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE PROCTER & GAMBLE COMPANY,

Case No. C 05-02014 PJH

Plaintiff,

V.

RONALD SHAW, JOHN YAN, a/k/a
JOHNNY YAN, SHI DAXIAN, a/k/a DA
XIAN SHI, JOHN DOES AND/OR JANE
DOES 1 - 50, AND XYZ BUSINESSES

**JOINT STIPULATION TO
EXTEND DATE OF CASE
MANAGEMENT
CONFERENCE;
DECLARATION OF
GREGORY B. WOOD; AND
ORDER THEREON**

Defendants

1 Pursuant to the Court's Order Setting Initial Case Management Conference,
2 dated May 17, 2005, the Case Management Conference was set for September 15,
3 2005. Counsel for the parties have met and agreed to extend the time for the Case
4 Management Conference by one week, until September 22, 2005, due to a conflict
5 that has recently arisen on the calendar of Gregory B. Wood, counsel for Procter &
6 Gamble Company, and due to the need to attend the Case Management Conference
7 in person rather than by telephone. The specific details of the need for the
8 extension is set forth in the attached Declaration of Gregory B. Wood in accordance
9 with L.R. 6-2.

10 Accordingly, pursuant to the stipulation of the parties and subject to the
11 approval of the Court, the current Case Management Conference date of September
12 15, 2005, is rescheduled to September 22, 2005, at 2:30 p.m. The Case
13 Management Statement and Rule 26(f) Report will be due to be filed on September
14 15, 2005.

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16 DATED: September 7, 2005

FULBRIGHT & JAWORSKI L.L.P.

17 By

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Gregory B. Wood (SBN 68064)
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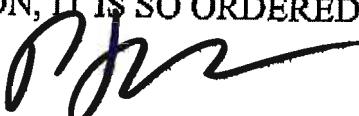
1 DATED: September 7, 2005

2 BAUGHMAN & WANG

3 By

4 Justin X. Wang (SBN 166183)
5 Steve Baughman (SBN 148958)
6 Baughman & Wang
111 Pine Street, Suite 1350
San Francisco, California 941117
8 Attorneys for Defendants Ronald Shaw,
9 John Yan & Da Xian Shi10 PURSUANT TO STIPULATION, IT IS SO ORDERED:
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12 Dated: 9/8/05

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United States District Judge

1 DATED: September ___, 2005

BAUGHMAN & WANG

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By

Justin X. Wang (SBN 166183)
Steve Baughman (SBN 148958)
Baughman & Wang
111 Pine Street, Suite 1350
San Francisco, California 94111

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7 Attorneys for Defendants Ronald Shaw,
8 John Yan & Da Xian Shi

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10 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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Dated: _____

United States District Judge

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DECLARATION OF GREGORY B. WOOD

I, Gregory B. Wood, declare as follows:

1. I am a partner with the law firm of Fulbright & Jaworski L.L.P., counsel of record for Plaintiff, The Procter & Gamble Company, and I am duly licensed to practice in the State of California. I have personal knowledge of the matters stated in this Declaration, and if called to testify I could and would competently testify thereto.

2. I was recently requested to be a panel leader for the Sedona Conference regarding electronic discovery issues and specifically to establish best practice guidelines for litigation holds and when a reasonable expectation of litigation arises. I will serve with Honorable Magistrate Judge Ronald Hodges on this panel. I was unaware that I could not attend the Case Management Conference by telephone and believed that L.R. 16-10(a) permitted attending by telephone. In order to allow me to fulfill my commitment to the Sedona Conference, I have telephoned opposing counsel, who agreed to a one week extension of time for the Case Management Conference until September 22, 2005.

3. There have been no other extensions of time requested by Procter & Gamble.

4. I do not believe that this one week extension will impact the schedule of this case as agreed by the parties and as will be presented in the Joint Case Management Statement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 

Executed on September 1, 2005

Gregory B. Wood

PROOF OF SERVICE

I, Susan Crippen, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 555 South Flower Street, 41st Floor, Los Angeles, California 90071. On September 8, 2005, I served a copy of the within document(s):

**JOINT STIPULATION TO EXTEND DATE OF CASE
MANAGEMENT CONFERENCE; DECLARATION
OF GREGORY B. WOOD; AND ORDER THEREON**

- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- by placing the document(s) listed above in a sealed _____ envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a _____ agent for delivery.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

Justin Wang, Esq.
Baughman & Wang
111 Pine Street
Suite 1350
San Francisco, CA 94111
Fax: (415) 576-9929

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service

1 is presumed invalid if postal cancellation date or postage meter date is more than
2 one day after date of deposit for mailing in affidavit.

3 I declare that I am employed in the office of a member of the bar of this court
4 at whose direction the service was made.

5 Executed on September 8, 2005, at Los Angeles, California.

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7 *Susan Crippen*
8 Susan Crippen
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